

UNITED STATES DISTRICT COURT APR 04 2018

for the

SOUTHERN DISTRICT OF TEXAS

Clerk of Court

United States of America)

v.)

Case No. M-18-0707-M

Saul Alan ELIZONDO (YOB: 1972)
USC)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 3/30/2018 in the county of Starr in the
SOUTHERN District of TEXAS, the defendant(s) violated:

Code Section

Offense Description

21 USC 841(a)(1)

Knowingly and intentionally possess with
intent to distribute approximately
104.500 kilograms of marijuana, a
schedule I controlled substance.

This criminal complaint is based on these facts:

On March 30, 2018 at approximately 8:30 p.m., U.S. Border Patrol (BP) Aerostat 4 Operator (AO) Agent Joshua Dickson advised over radio that he observed several subjects placing several bundles (later identified to be marijuana) into the back of a small sized SUV (Traverse) and that a second vehicle (Cadillac) was adjacent to it. Rio Grande City BP ground Agent Mario Cervantes responded to the reported area and heard the AO advised that the Traverse was leaving the area followed by the Cadillac. The AO advised that he had constant view of both vehicles as they travelled in tandem north on KCTM FM 103.

(Continued on Attachment I)

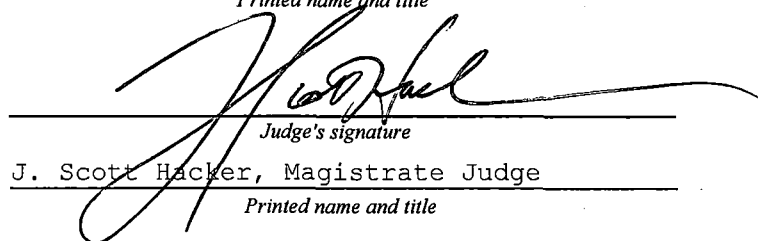
☒ Continued on the attached sheet.

Complainant's signature

Aida L. Gonzalez, DEA Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 4-4-18City and state: McAllen, Texas

Judge's signature

J. Scott Hacker, Magistrate Judge

Printed name and title

Attachment I

BP Agent Cervantes quickly arrived to the location and proceeded to drive southbound on KCTM FM 103 Road. Agent Cervantes observed the Traverse (followed by the Cadillac) drive towards Agent Cervantes' BP unit in an attempt to strike it, but narrowly missed and stopped. The Traverse then proceeded to rapidly reverse, struck a steel barrier and came to a stop. Agent Cervantes exited his BP unit in an attempt to place the driver under arrest, then observed the Traverse attempt to drive towards him (Cervantes) and his BP unit, but quickly stopped. Agent Cervantes then observed that the driver of the Traverse, later identified as Saul Alan ELIZONDO, proceeded to flee on foot. ELIZONDO was then observed attempting to unsuccessfully get into the Cadillac then ran south on KTCM FM 103 Road on foot, chased by Agent Cervantes.

After an approximate twenty second chase and never losing sight of ELIZONDO, Agent Cervantes was able to apprehend and restrain ELIZONDO. BP Agent Roberto Trevino also responded to the area to assist and was able to secure the Traverse, which was found to contain twenty (20) bundles of marijuana weighing at approximately 104.500 kilograms. BP agents then transported ELIZONDO and the loaded Traverse to the Rio Grande City BP Station for further processing.

On March 31, 2018. At approximately 4:00 a.m., DEA SAs Aida Gonzalez and TFA Graciano Gamino, responded to the Rio Grande City Station to interview ELIZONDO. At approximately 4:13 a.m., SA Gonzalez, as witnessed by TFA Gamino, read ELIZONDO his Miranda Rights in his preferred language of English. ELIZONDO acknowledged his rights and agreed to answer the agents' questions. Regarding the event that led to his arrest, ELIZONDO stated that three days ago he was at a Cantina when he overheard a male subject offer someone the job of transporting marijuana for \$500 dollars. ELIZONDO stated that that subject turned down the job offer and that's when ELIZONDO willingly volunteered to drive the marijuana for \$500 U.S. dollars.